

UNDERWOOD & MICKLIN, LLC

1236J BRACE ROAD

CHERRY HILL, NJ 08034

(856) 616-8401

By: Andrew Micklin, Esquire (AM9336)

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Chapter 13

In Re:

TIMOTHY B. DOW, SR.

Case No.: 17-31355 JNP

Judge: JERROLD N. POSLUSNY, JR.

**NOTICE OF MOTION TO REINSTATE
AUTOMATIC STAY**

TO:

Robertson, Anschutz, & Schneid

6409 Congress Ave., Suite 100

Boca Raton, FL 33487

Attention: Harold Kaplan Esquire

Isabel C. Balboa, Esquire

Standing Chapter 13 Trustee

535 Route 38, Suite 580

Cherry Hill, NJ 08002

PLEASE TAKE NOTICE That the undersigned attorney for the Debtor,

Timothy B. Dow, Sr., moves before the Honorable Jerrold N. Poslusny, Jr., United States Bankruptcy Court, 401 Market St., Camden, New Jersey as soon as thereafter as counsel may be heard for the following relief:

1. Reinstating the Automatic Stay, and
2. For such other and further relief as is just.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Underwood & Micklin, LLC, will rely upon the Certification of Debtor.

STATEMENT REGARDING BRIEF

PLEASE TAKE FURTHER NOTICE that the undersigned believes that no brief is necessary because no real or complex issues of law are contemplated.

PLEASE TAKE FURTHER NOTICE that unless timely responsive papers are filed in accordance with the appropriate rules, this Motion shall be deemed uncontested.

UNDERWOOD & MICKLIN, LLC

/s/ Andrew Micklin

Andrew Micklin, Esquire

Attorney for Debtor

DATED: 2/4/19

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CERTIFICATION OF DEBTOR

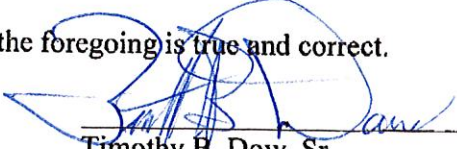
IN SUPPORT OF

NOTICE OF MOTION

TO REINSTATE CHAPTER 13

I, Timothy B. Dow, Sr., of full age, hereby certify as follows:

1. I am the debtor and as such familiar with the facts herein.
2. I make this certification in support of my Motion to Reinstate my Chapter 13 case.
3. On or about August 14, 2018 the Honorable Jerrold N. Poslusny, Jr. signed an Order vacating the automatic stay as it related to Wells Fargo for failure to pay post-petition mortgage payments.
4. I've had medical issues, specifically cancer, which required hospitalizations and major surgery in the last year, specifically surgery to remove my remaining kidney. That as well as other medical needs such as dialysis, doctor visits, have caused me to miss a substantial amount of work thereby causing me the inability to make some mortgage payments.
5. My attorney has reached out to the attorney for Wells Fargo on several occasions to determine the amount of missed post-petition payments, but to date has not received the information.
6. I respectfully ask the Court to reinstate the automatic stay as it related to Wells Fargo and upon receiving the amount due, allow me a period of time to bring the post-petition payments current.
7. With everything else going on medically, I wish to do everything possible to retain my home.
8. I certify under penalty of perjury that the foregoing is true and correct.


Timothy B. Dow, Sr.
Debtor